

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CALVIN L. FIELDS  
DEBORAH HUGHES

Plaintiffs,

V.

COUNTY OF COOK, COOK COUNTY  
SHERIFF TOM DART, INTERNATIONAL  
BROTHERHOOD OF TEAMSTERS LOCAL  
UNION #714

**Defendant.**

No. 08 C 4416

**Judge Bucklo**  
**Magistrate Judge Nolan**

**NOTICE OF FILING**

**TO: ELECTRONIC FILING AND U.S. MAIL**

**PLEASE TAKE NOTICE** that on this August 25, 2008, the undersigned attorney electronically filed Defendant's Motion for an Enlargement of Time in which to answer or otherwise plead with the Clerk of the United States District Court, for the Northern District of Illinois, Eastern Division using the CM/ECF filing system. Courtesy copies delivered to chambers at the time of filing.

**RICHARD A. DEVINE**  
State's Attorney of Cook County

By: S/Jamieson B. Bowman  
Jamieson b. Bowman  
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CALVIN L. FIELDS,  
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SHERIFF TOM DART, INTERNATIONAL  
BROTHERHOOD OF TEAMSTERS UNION  
LOCAL #714.

Defendants.

No. 08 CV 4416

Judge Bucklo

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**DEFENDANT'S MOTION  
FOR AN ENLARGEMENT OF TIME**

NOW COME the Defendants, County of Cook, Cook County Sheriff Tom Dart, by their attorney, RICHARD A. DEVINE, State's Attorney of Cook County, through his assistant, JAMIESON B. BOWMAN, Assistant State's Attorney, and hereby move this Honorable Court, pursuant to Federal Rule of Civil Procedure 6(b), for an enlargement of time in which to answer or otherwise plead to Plaintiff's Complaint and, in support of this motion, state as follows:

1. The Defendants were served with a summons and complaint in this case on approximately August 6, 2008.
2. Defendants' counsel was assigned to this matter on August 12, 2008.
3. To date, Defendants have been diligently preparing their answer, however, due to unanticipated litigation responsibilities Defendants require an extension of time in which to complete and file their responsive pleading.
4. This Motion is not made for dilatory reasons, rather it is a request for additional time made in good faith to enable the undersigned attorney to meet all obligations

in a reasonable and orderly manner and will allow him to complete a well developed responsive pleading.

5. Defendants therefore request an extension, until September 25, 2008, within which to file their Answer to the Complaint or to otherwise plead.
6. Defendants' counsel sought Pro Se Plaintiffs' agreement to the Defendants' enlargement request. Pro Se Plaintiffs' did not agree to the enlargement request.
7. This is Defendants' first request for an enlargement of time.
8. The request for an enlargement of time is made in good faith and will not prejudice the parties in this matter.

WHEREFORE, Defendants respectfully request that this Honorable Court enlarge the time in which Defendants must answer or otherwise plead until September 25, 2008.

Respectfully submitted,

RICHARD A. DEVINE  
State's Attorney of Cook County

BY: S/ Jamieson B. Bowman  
Jamieson B. Bowman  
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Civil Actions Bureau, Labor  
Chicago, Illinois 60602  
(312) 603-3032

#### **CERTIFICATE OF SERVICE**

I, Jamieson B. Bowman, Assistant State's Attorney, certify that I served a copy of the foregoing by mailing a copy of the same to the Plaintiffs' by depositing same in the U.S. Mail at 500 Richard J. Daley Center, Chicago, Illinois 60602, before 5:00 p.m. on August 25, 2008, and by filing a copy electronically with the Clerk of the Court.

S/Jamieson B. Bowman  
Jamieson B. Bowman